

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**UNITED STATES OF AMERICA**

**VS.**

**CHRISTOPHER REINHARD BROWN**

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§

**CRIMINAL NO: 4:24-CR-00126-P**

**DEFENDANT'S MOTION FOR RELEASE  
FROM DETENTION PENDING SENTENCING**

**TO THE HONORABLE JUDGE MARK T. PITTMAN:**

Defendant, **CHRISTOPHER REINHARD BROWN**, by and through his attorney of record, **BRETT D. BOONE**, moves for Defendant's release from detention pending sentencing as prescribed in 18 U.S. Code §3143(a)(1) and in support thereof would show the following:

**I.**

Defendant has requested his attorney make the following information known to the Court in support of his release:

1. Defendant has made arrangements for travel between Atlanta, Georgia and Fort Worth, Texas (See attached Exhibit A);
2. Defendant agrees to house arrest and has made arrangements for a place to stay for this purpose (See attached Exhibit A);
3. Defendant's vacation to Kenya earlier this year was paid for by his fiancé, Deborah Marshall;
4. Defendant needs to be in Atlanta, Georgia soon to complete the sale of the family home while serving as executor of his mother's estate;
5. Defendant had no glasses at his detention hearing in Atlanta, Georgia and could not read any of the documents. The attorney representing Defendant at the detention hearing read the documents to him 10 minutes prior to the hearing;

6. Defendant will surrender his passport;
7. Defendant needs to continue cancer treatments;
8. Defendant is relied upon by his community as an Election Poll Manager;
9. Defendant needs dental work that cannot be performed at the Johnson County Correctional Facility; and
10. Defendant is willing to take a lie detector test to verify he had no involvement in creating the recent website.

## II.

18 U.S. Code §3143(a)(1) provides that if “...the judicial officer finds by clear and convincing evidence that the person is not likely to flee or pose a danger to the safety of any other person or the community...” said judicial officer shall “...order the release of the person in accordance with section 3142(b) or (c).” 18 U.S. Code §3142(b) or (c) sets out the conditions of the release.

## III.

Defendant is set for re-arraignment/plea on Wednesday, July 17, 2024 at 9:30 a.m. before Magistrate Judge Jeffrey L. Cureton and requests this Motion be heard after Defendant’s plea has been entered.

Respectfully submitted,

/s/ Brett D. Boone

BRETT D. BOONE

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ATTORNEY FOR DEFENDANT

**CERTIFICATE OF CONFERENCE**

On July 16, 2024, the undersigned counsel attempted to confer with Brandie Wade, Assistant United States Attorney.

/s/ Brett D. Boone  
BRETT D. BOONE

**CERTIFICATE OF SERVICE**

I hereby certify that on July 16, 2024, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means: Ms. Brandie Wade, Assistant United States Attorney.

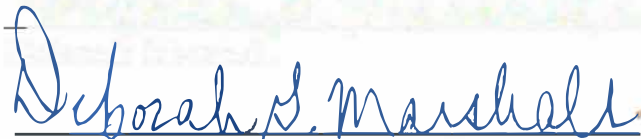
/s/ Brett D. Boone  
BRETT D. BOONE

**To Whom it May Concern:**

I, Deborah Marshall, certify that I will be responsible for providing Christopher Reinhard Brown with transportation from Dallas/Fort Worth, Texas, to my home in Atlanta, Georgia, upon his release from custody. I will also be responsible for providing return transportation from Atlanta, GA to Dallas/Fort Worth at such times the Court schedules hearings.

In addition, Christopher Reinhard Brown will be staying under house arrest at my residence in Atlanta, GA, located at the following address:

Deborah Marshall  
1002 Defoors Mill DR NW  
Atlanta, GA 30318-2358



signed this the 15<sup>th</sup> day of July, 2024.  
Deborah Marshall

**NOTARY ACKNOWLEDGMENT**

State of Georgia  
County of Fulton

On this 15th day of July, **2024**, before me, the undersigned notary public, personally appeared [Your Friend's Name], known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to this instrument, and acknowledged that they executed it for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.

Notary Public



My commission expires: 3/2/2027

